

FORMATION

CR-71 REV. 1-17

Police Case number
1700019568STATE OF CONNECTICUT
SUPERIOR COURT

Disposition date

Agency name
New Canaan PoliceAgency number
0090

Title, Allegation and Counts

State of Connecticut vs. (Name of accused) Gluck, Bruce	Residence (Town) of accused Middletown Springs, VT	Docket number
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Address
44 South STTo be held at (Town)
Stamford SuperiorGeographical area number
S01SDate of birth
02/18/1958Court date
The undersigned Prosecuting Authority of the State of Connecticut charges that:Count One — Did commit the offense of:
LARC 1ST-DEFRAUD PUB COM>\$2000At (Town) On or about (Date)
New Canaan 12/14/2016 In violation of General Statute number
53a-122(a)(4)

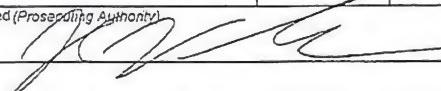
Count Two — Did commit the offense of:

CONSPIRACY TO COMMIT/ LARC 1ST-DEFRAUD PUB COM>\$2000

At (Town) On or about (Date)
New Canaan 12/14/2016 In violation of General Statute number
53a-48/53a-122(a)(4)

Count Three— Did commit the offense of:

TAMPERING-PHYSICAL EVIDENCE

At (Town) On or about (Date)
New Canaan 05/11/2018 In violation of General Statute number
53a-155 See other sheet for additional counts Date
4/18/19 Signed (Prosecuting Authority)


Court Action

Defendant advised of rights before plea
(Judge) (Date) Attorney Public defender Guardian Bond change Seized property inventory numberBond Surety 10 %
 Cash Election (Date)
 CT JY

Count Plea date Plea Plea withdrawn Verdict finding Fine Remit Additional disposition

1

2

3

Date Other Court Action Judge

Receipt number Cost Bond information
 IMP NCI Bond forfeited Forfeiture vacated Forfeiture vacated and bond reinstatedApplication fee - receipt number Circle one Program fee - receipt number Circle one Probation fee - receipt number Circle one
if paid W I Q if paid W I Q if paid W I Q

Prosecutor on original disposition Reporter/monitor on original disposition Signed (Clerk) Signed (Judge)

INFORMATION JD-CR-71 Rev. 1-17	STATE OF CONNECTICUT SUPERIOR COURT	Disposition date
Police Case number 1700019568	Agency name New Canaan Police	Agency number 0090

Arrest Warrant

Geographical area number S01S **State of Connecticut vs. Gluck, Bruce**

To: Any Proper Officer of the State of Connecticut

By Authority of the State of Connecticut, you are hereby commanded to arrest the body of the
within-named accused. ("X" all that apply)

- A. Accused is ordered to be brought before a clerk or assistant clerk of the Superior Court.
 - B. Accused is not entitled to bail.

If A, B or both are checked above, you shall without undue delay bring the arrested person before the clerk or assistant clerk of the Superior Court for the geographical area where the offense is alleged to have been committed, or if the clerk's office is not open, to a community correctional center within said geographical area, or the nearest community correctional center if no such center exists in the geographical area, or to the Correctional Institution, as the case may be.

- C. Bail set at 50,000

D. Non-financial conditions of release:

Extradition boundaries established by prosecutor

- E. Conditions of release not determined by the court.

By the Court Signed Judge of the Superior Court) Date 0-11-19 Name of the Judge (Print or type) Hudock

Return On Arrest Warrant

Geographical area number	Town of _____	Date _____	State of Connecticut
Then and there, by virtue of the within and foregoing complaint and warrant, I arrested the body of the within-named accused and read the same in the hearing of said accused; and have said accused here in court for examination.			

(Attest/Officer's signature and Department)

ARREST WARRANT APPLICATION

JD-CR-64b Rev. 3-11
C.G.S §§54-2a
Pr. Bk. Sec. 36-1, 36-2, 36-3

STATE OF CONNECTICUT

SUPERIOR COURT
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For Court Use Only

Supporting Affidavits sealed
 Yes No

Police Case number
1700019568

Agency name
New Canaan Police

Agency number
0090

Name (Last, First, Middle Initial)
Gluck, Bruce

Residence (Town) of accused
Middletown Springs

Court to be held at (Town)
Stamford Superior

Geographical Area number
S01S

Application For Arrest Warrant

To: A Judge of the Superior Court

The undersigned hereby applies for a warrant for the arrest of the above-named accused on the basis of the facts set forth in the: Affidavit Below. Affidavit(s) Attached.

Date 4/18/19	Signed <i>(Prosecuting authority)</i> 	Type/print name of prosecuting authority JOSE C. VALDES
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Affidavit

The undersigned affiant, being duly sworn, deposes and says:

1. That the undersigned, Sergeant Peter Condos, is a regular member of the New Canaan Police Department, and has been a member of said department for the past thirty one years and at all pertinent times mentioned herein was acting in his official capacity as a member of said department. The following facts and circumstances are stated from personal knowledge, observation, and investigation, as well as from information received from brother officers acting in their official capacity.

2. That on December 21, 2017, at 0900 hours, this affiant, along with Sgt. Casey, met with [REDACTED] [REDACTED] who is the Director of Finance and Operations of the Board of Education for the Town of New Canaan. [REDACTED] wanted to discuss the theft of money that has been occurring within the school system. The thefts allegedly have been taking place at the New Canaan High School (NCHS) and Saxe Middle School cafeterias for possibly up to 15 years.

3. That the Board of Education (BOE) conducted an internal investigation based on a complaint from a cafeteria worker. That complaint included the mishandling of money. [REDACTED] believes a theft occurred and that theft may have been committed by Marie Wilson and her sister Joanne Pascarelli. Wilson is the NCHS Assistant Food Director and her sister, Joanne Pascarelli, who was in charge of the Saxe Middle School food program. Both were involved in cash intake at the registers of the school cafeterias. [REDACTED] was not sure if other employees were involved in the thefts.

(This is page 1 of a 16 page Affidavit)

Date APRIL 18, 2019	Signed <i>(Affiant) Peter Condos</i> Sgt. Peter Condos
Jurat Subscribed and sworn to before me on (Date) APRIL 18, 2019	Signed <i>(Judge/Clerk, Commissioner of Superior Court, Notary Public)</i>

Finding

The foregoing Application for an arrest warrant, and affidavit(s) attached to said Application, having been submitted to and considered by the undersigned, the undersigned finds from said affidavit(s) that there is probable cause to believe that an offense has been committed and that the accused committed it and, therefore, that probable cause exists for the issuance of a warrant for the arrest of the above-named accused.

Date and Signature 	Signed at (City or town) New Canaan	On (Date) April 18, 2019	Signed (Judge/Judge Trial Referee) 	Name of Judge/Judge Trial Referee Hancock
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ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11

C.G.S § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

CFS #: 1700019568

STATE OF CONNECTICUT

SUPERIOR COURT

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New Canaan Police

Name (Last, First, Middle Initial) Gluck, Bruce	Residence (Town) of accused Middletown Springs	Court to be held at (Town) Stamford Superior	Geographical Area number S01S
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Affidavit - Continued

4. That on or about November 16, 2017, Pascarelli was placed on [REDACTED] while the BOE looked into the possible theft of money. Her sister, Marie Wilson was already out on [REDACTED] since September 2017. When all the discrepancies became known, the BOE recommended to Pascarelli in December 2017 that she [REDACTED]. She retired. Shortly thereafter, on or about December 4th 2017, Marie Wilson retired from her position at the school.

5. That [REDACTED] became aware of the potential thefts when the school board decided to look at how their employees handled cash after a different, unrelated, incident had occurred. [REDACTED] began to look at the High School and Saxe lunch programs and noticed discrepancies with the cash intake at both schools. In the summer of 2016 [REDACTED] and the Board of Ed instituted a new point of sale system called [REDACTED]. The [REDACTED] system incorporated a [REDACTED] accounting format. In this type of system the cashier is unaware of the amount taken in and must count out the drawer and sign a deposit slip for the money they counted. The [REDACTED] Point of Sale (POS) system knows how much of each type of bill and change should have been brought in. Upon instituting this system, the BOE noticed a substantial increase in the daily cash deposits directly after Marie Wilson and Joanne Pascarelli retired and left the BOE.

6. That on January 16, 2018, at approximately 09:30 hours, Sgt. Casey and I met with [REDACTED] the Budget Director for the New Canaan Board of Education. [REDACTED] stated that the BOE accountant, [REDACTED] had compiled all the documents related to this case as we requested. The documentation included deposit slips, till reports and financial records from Saxe Middle School and the High School food service divisions for the past 5 years- Fiscal years 2013 thru 2018. Our purpose for viewing the documents was to get a better understanding of where the losses were occurring so we could begin to focus our investigation. What stood out were the "Till Reports." These reports show each point of sale terminal, who was logged into it and how much, if any, cash was brought in each day. These till reports allowed us to look for any patterns with employees as it pertains to taking in cash at the registers. We requested copies of those documents going back 5 years. [REDACTED] explained that the current [REDACTED] POS system has only been in service for the past year and a half or so. Any similar documents would have to come from their old system which was called [REDACTED]. It is noted that many of the [REDACTED] documents are missing and presumed lost, secreted, or destroyed by any potential suspect as they would help record daily money totals.

7. That on January 25, 2018 at approximately 1030 hours, Sgt. Casey met with [REDACTED] and [REDACTED]

(This is page 2 of a 16 page Affidavit)

Date	Signed (Affiant) <i>[Signature]</i>		
Jurat Subscribed and sworn before me on Date) 4/18/19		Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i>	
Reviewed (Prosecutorial Official) <i>[Signature]</i>	Date 4/18/19	Reviewed (Judge/Judge Trial Referee) <i>[Signature]</i>	Date 04/18/19

ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11

C.G.S § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

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STATE OF CONNECTICUT

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Name (Last, First, Middle Initial) Gluck, Bruce	Residence (Town) of accused Middletown Springs	Court to be held at (Town) Stamford Superior	Geographical Area number S01S
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Affidavit - Continued

[REDACTED] (BOE Accountant) at 39 Locust Ave. After lengthy examination of financial documents, [REDACTED] stated that the overall loss is approximately \$500,000 (five hundred thousand dollars) which encompasses both schools. [REDACTED] stated that they will have [REDACTED] (BOE accountant) break it down to each year.

8. That on January 26, 2018, Sgt. Casey went to New Canaan High School where Food Service Director Bruce Gluck & Marie Wilson were in charge of the lunch program before they left the school system. As part of the investigation, Sgt. Casey observed the lunch program in action at New Canaan High School (NCHS) to see how the cash was handled. Four cash registers are utilized at NCHS and all four registers were taking in cash.

9. That in the cash register till reports provided by the BOE during the alleged theft time frame in question clearly substantiates that some of the registers showed no cash coming in at all for long periods of time. As noted, immediately upon the retirement of suspects Wilson and Pascarelli, cash intake began soaring and registering in substantially higher amounts.

10. That on February 5, 2018, Marie Wilson came to Police Headquarters for her voluntary interview and she brought attorney Steven Frederick with her. Sgt. Casey and Detective Patten conducted the interview. Wilson and her attorney were informed that she was here voluntarily, was free to leave at any time, and did not have to answer our questions. She stated that she understood.

11. That Wilson stated that she retired December 4th, 2017. She called to see about her pension which she stated the town is withholding because she is under investigation. She was surprised by this. Wilson stated that the only thing she is guilty of is feeding a child who had no money or giving somebody a cookie and that's it, that's all she has ever done. She said she has always done her best and never called in sick for 30 years. She stated that her title when she left her position was Acting Director. Wilson stated that the past 3 years has changed when [REDACTED] (BOE Director of Finance & Operations) arrived. She decided on new policies. Originally the cashiers would give her the register drawers and she would count money with Bruce Gluck- the Food Services Director and Wilson's direct Supervisor. Wilson would fill out the deposit slip and deposit the money in the bank the next day.

12. That when asked about Bruce Gluck and if he may have been involved Wilson stated, "I don't think so". When asked "Who do you think took money?" Wilson said that she had no idea. She said nobody told her

(This is page 3 of a 16 page Affidavit)

Date <i>April 18, 2019</i>	Signed (Affiant) <i>Sgt. M. P. 10</i>
Jurat <i>Subscribed and sworn before me on Date 4/18/19</i>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i>
Reviewed (Prosecutorial Official) <i>[Signature]</i>	Date <i>4/18/19</i>
Reviewed (Judge/Judge Trial Referee) <i>[Signature]</i>	Date <i>04/18/19</i>

ARREST WARRANT APPLICATION

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STATE OF CONNECTICUT
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Name (Last, First, Middle Initial) Gluck, Bruce	Residence (Town) of accused Middletown Springs	Court to be held at (Town) Stamford Superior	Geographical Area number S01S
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Affidavit - Continued

there was any discrepancy and if she thought there was she would have said something.

13. That when discussing the end of the day and counting the money Wilson stated that originally she would count the drawers because it would take the cashiers too long. She would count the money in front of them. Then they would recount and officially punch it in. But she had the till reports so she could tell if the money amount was wrong and they could recount and put the right amount in. When asked if she meant she would put the right amount in, or the money in, she stated both. When asked where she would get the money from she stated that it was in the register, it was either miscounted or they would fix it. Again asked how she would "fix it" she said it would be there. She did state that a couple of times she took money from her own pocket to fix it for a couple of girls.

14. That Wilson was asked if all the registers were pooled together and you can take money from one to make the other match, or was each one was specific. Wilson replied the last 3 years it was very specific but before that it wasn't, it was one pooled number. It is now specific to each register. Detective Patten asked if she would borrow from one register to make the others match. Wilson said the old way we could but not anymore.

15. That when asked how much cash NCHS would bring in each day, Wilson avoided giving a number but offered many excuses as to why the numbers would change. She said it would depend on what they were serving. Some kids would prefer a sandwich and they were more expensive. She said exams would affect the cash taken in. In January a lot of kids moved out of the area so that would change the numbers. Rainy days versus sunny days would affect the cash flow.

16. That it was asked- what happens if the register is over and there was extra cash in the drawer. Wilson said "oh yeah they caught me with eighteen dollars extra in my petty cash". She said she would use that money to make change and to adjust the registers if they were short a few dollars.

17. That, Wilson was asked- who filled out the deposit slips? She said that she would fill out the deposit slips herself and the girls (cashiers) would take it from her and put it in their bag. They would come to her with their drawer and tell her how much they had in their bag. When the cashiers closed she could see if the money wasn't right and she would tell them to count it again. They would recount and if it was then correct she would write on the deposit slip. Wilson stated that she did not need to sign the deposit slips but you could see her handwriting on them. Then she would put it in the bag and [redacted] would

(This is page 4 of a 16 page Affidavit)

Date	Signed (Affiant) <i>SGT. [Signature]</i> 5/10		
Jurat	Subscribed and sworn before me on Date 4/18/19	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i>	
Reviewed by (Prosecutorial Official) <i>[Signature]</i>	Date 7/18/19	Reviewed by (Judge/Judge Trial Referee) <i>[Signature]</i>	Date 04/18/19

ARREST WARRANT APPLICATION

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Affidavit - Continued

take a copy of it. I would bring it to the bank the next morning.

18. That Wilson was asked if she ever told the cashiers that she would just do the deposit slips and the whole process for them, so as to have no involvement? She stated, No not in the last 7 or 8 months that I was there.

19. That Wilson was asked if she ever asked anybody to sign a blank deposit slip? Wilson stated "No, absolutely not." Did Bruce have any involvement with the deposit slips or have to sign them? Wilson stated, No I just told him every day that it was done.

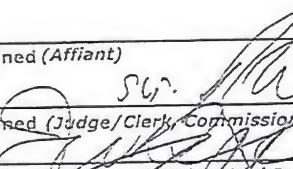
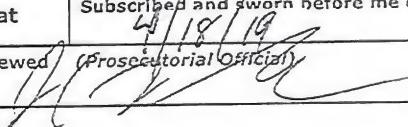
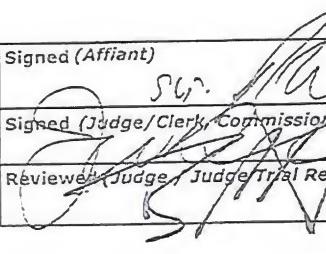
20. That Wilson was asked if Bruce Gluck could have altered any of the deposit slips afterwards and possibly stolen some of the money. Wilson said no not at that point and she never saw anything that would warrant her to say he was involved in any stealing of money.

21. That Wilson was asked her about the missing [redacted] documents. Wilson stated that she did not have to keep them, there was nothing to store, she wasn't told to keep them ([redacted] reports this is absolutely a violation of school procedure). She stated that Bruce would have had that paperwork. She had no idea what happened to the [redacted] paperwork. Wilson then said that administration always dealt with Bruce and not with her in regards to the [redacted] paperwork. She had no idea what happened to the paperwork from [redacted]

22. That Wilson was asked if someone could take advantage of the fact that with [redacted] there were no checks and balances. Someone could be taking money from the register and nobody would know because there is no paperwork to track. Wilson stated, "With all the people around it would be really hard, it's not like they went into a little closet or something with their draw afterwards, you've seen the high school there is people everywhere, somebody would notice if somebody was putting something in their pocket. But that is my opinion." Wilson went on to say that she would have noticed if somebody was putting something in their pocket.

23. That it was explained to Wilson that we had been reviewing the till reports and watching the food service area in person to see how it worked and we noticed all the registers were taking in cash. Sgt. Casey then showed her that the till reports from the period she was in charge showed that some of the registers were taking in zero cash. There is a big discrepancy from the time she worked there and then

(This is page 5 of a 16 page Affidavit)

Date	Signed (Affiant)		
APRIL 18, 2019			
Jurat	Subscribed and sworn before me on (Date)	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	
Reviewed (Prosecutorial Officer)	Date	Reviewed (Judge, Judge/Trial Referee)	Date
	4/18/19		04/18/19

ARREST WARRANT APPLICATION

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Affidavit - Continued

after [REDACTED] she left. When asked how this was possible she said, "I don't know, if they didn't have cash that's all I could think of. If they didn't have cash then we didn't put it in." When informed that some of the girls, usually the same girls, almost never brought in any cash and how was that possible she said, "there were days that I didn't have cash either." When explained that it wasn't just one or two days with no cash, it was weeks and months Wilson said, "I don't know I couldn't tell you." When asked that as the supervisor if there was no cash being brought in for months at a time, wasn't that a red flag that something might be going on she replied, "no it wasn't unusual for me at the time, no." Wilson went on to state that a lot of people didn't have cash when we started coming down on the al a carte items then we started to see cash.

24. That Wilson was confronted with the fact that as soon as she left, all registers were taking in cash on a regular basis and the amount of cash has gone up dramatically and that some of the workers have been saying that she was taking the cash. When told that her pension may be in jeopardy since the town is withholding it pending this investigation her response was, "Did you go through my bank records yet? Then do that, because I am sure you will see I have no problems, um, with any of that. Um I made a lot of money, but not this way. You know I made a lot of money selling a house in New Canaan. I made a lot of money selling, um a house I was starting to build in Wilton. I mean, I don't think, I don't think I have anything to worry about."

25. That, Detective Patten asked if there was anyone else there that can account for this loss? Wilson stated, "I don't know." She was informed that somebody or multiple people were stealing possibly up to \$500 a day under her watch and supervision. Wilson said, "I know what you're saying but I can't image that. I mean quite honestly, Five hundred a day is a good amount of money, and I wouldn't mind it but no. The interview with Marie Wilson was concluded at that time. She declined to provide a voluntary written statement.

26. That on March 2, 2018, Detective Patten and Sgt. Casey interviewed Joanne Pascarelli in regards to the possible theft of money at Saxe Middle School in identical ways as the high school. During that interview she was asked a few questions that may relate to the theft of money at New Canaan High School. When asked if she thought anyone was stealing money, Pascarelli responded that she didn't think anyone stole any money. She did not know if Bruce Gluck was capable of stealing money. When asked if her sister, Marie Wilson, would steal money, Pascarelli responded No not at all.

27. That on March 5, 2018, Sgt. Casey spoke with [REDACTED] at the BOE. [REDACTED] said that the

(This is page 6 of a 16 page Affidavit)

Date	Signed (Affiant)	
Mar 18, 2019	SG: [Signature] 3/18	
Jurat	Subscribed and sworn before me on Date	
W/18/19	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	
Reviewed (Prosecutor's Official)	Date	Reviewed (Judge/Judge Trial Referee)
[Signature]	3/18/19	[Signature]
		Date
		3/18/19

ARREST WARRANT APPLICATION

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Affidavit - Continued

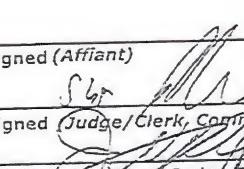
accountants at BOE used actual deposit slips and bank statements which they compared to the averages of cash deposits. The BOE gave their official estimate of the financial loss to the school board. [REDACTED] stated that the official estimated loss from Saxe Middle School for the period of time of 2012 to 2017 is \$127,682 (One hundred twenty seven thousand six hundred eighty two dollars.) [REDACTED] also stated that the official loss from New Canaan High School for the same time period of 2012-2017 is \$350,906 (Three hundred fifty thousand nine hundred and six dollars.) [REDACTED] stated that these numbers were accurately compiled to come up with the financial loss from both schools. It is believed that the thefts were occurring much farther back than 2012 but school records and statute of limitations prevented looking further back in time.

28. That on March 5, 2018, at approximately 1415 hours, Detective Patten and Sgt. Casey interviewed [REDACTED] at Police Headquarters. [REDACTED] is a cashier at New Canaan High School. [REDACTED] has worked at the high school for the past 3 years. She stated that her supervisors during that time were Bruce Gluck and Marie Wilson. [REDACTED] stated that she arrives at 0600 hours and she sets up the fruit and the she is in charge of the salad bar. At about 1100 hours when it is time for lunch she goes and works at a cash register. [REDACTED] was asked how the money is handled at the register. She stated that now, while working for new supervisor [REDACTED], she counts her draw in the morning and starts with \$67.00. While working with Wilson, [REDACTED] said that she didn't count the drawer, Wilson told them it was already counted. When lunch was finished the cashiers would give their drawers to Wilson. [REDACTED] said that the cashiers did not count the drawer. [REDACTED] said that Wilson did not count the drawer in front of her. She knew Wilson was the one counting the money because if she [REDACTED] went into Marie's office she would see her counting the money.

29. That Patten asked [REDACTED] to explain how the money is handled now under [REDACTED] supervision. [REDACTED] stated that now they have to do everything themselves. They have to count the \$67.00 that they start the day with and have to count the money at the end of the day. The money is put in an envelope and the amount is put in a book. The bag of money is then brought to [REDACTED] the Secretary. Patten asked [REDACTED] if she ever questioned why Wilson was counting the money. [REDACTED] responded, No because we believe her. Patten asked her if she ever thought any wrongdoing was going on. [REDACTED] chuckled and said, "You never know, you think why is here so different (than other cash procedures) but I never ask her because it's not my business."

30. That Patten asked [REDACTED] if there was ever any time that she didn't take in any cash for the register.

(This is page 7 of a 16 page Affidavit)

Date	Signed (Affiant)		
April 18, 2019			
Jurat	Subscribed and sworn before me on (Date)	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	
Reviewed (Prosecutorial Official)	Date	Reviewed (Judge/Judge Trial Referee)	Date
[Signature]	4/18/19	[Signature]	04/18/19

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Affidavit - Continued

[redacted] said, No kids pay cash too. She said that now she brings in about \$140.00 or \$150.00 a day. She said the other registers are about the same, some bring in more. [redacted] said that before (with Wilson) it was at least \$100.00 for sure.

31. That we explained to [redacted] that we looked at the till reports and they showed that there were numerous days that when she worked the register, she brought in no cash whatsoever- Sept 14, 2016 - Dec 2, 2016. [redacted] said she absolutely put money in the drawer during that time. [redacted] seemed surprised that there was no money listed as being taken in. [redacted] was asked if the cash flow seemed the same or if it was different. She said that cash intake is almost every day the same. She said it was \$120, \$130, \$140 somewhere about that much each day.

32. That we asked if Bruce Gluck ever had taken any money. She said she wasn't sure but she only saw Wilson with the money drawer. She said sometimes [redacted] (secretary) would be with Wilson. [redacted] was asked how it was possible that she showed no money being brought in if she had to enter the transactions with the new [redacted] system. [redacted] said that her station is very busy and she was told to not enter the money if she was busy, to just put the money in the drawer without entering any amount.

33. That she said her supervisor Marie Wilson told her to do that.

34. That on March 16, 2018, Sgt. Casey met with [redacted] and her son, [redacted]. They came in voluntarily for an interview and to give a statement in regards to this investigation. Her son came with her to assist in helping her write the statement. Both parties were advised that they were there voluntarily and could leave at any time. The interview was being recorded. Sgt Farenga was present for the interview. [redacted] said she is the lead cashier at NCHS. She stated that her boss was Maria Wilson. [redacted] stated that she would arrive at about 0700 hours and her cash drawer would be already set up for her. [redacted] said that Wilson set up the drawer but she [redacted] never counted it when she started the day. She said that Wilson would count the money at the end of the day. [redacted] said that there were 4 registers and all registers took in some cash. [redacted] said she was busy at her register and she would take the cash but not enter it into the register. [redacted] said there was never a day when they did not take in cash.

35. That, [redacted] was asked if she ever stole any cash, was asked by anyone else to steal cash or not put money into the register. [redacted] replied that they have a new system which she was trained on and that system they are supposed to enter the money in the register. [redacted] says that she always enters the cash in

(This is page 8 of a 16 page Affidavit)

Date	April 18, 2019	Signed (Affiant) JGF: [Signature]
Jurat	Subscribed and sworn before me on (Date) 4/18/19	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) [Signature]
Reviewed (Prosecutorial Official) [Signature]	Date 4/19/19	Reviewed (Judge Trial Referee) [Signature]
		Date 04/18/19

ARREST WARRANT APPLICATION

JD-CR-64a Rev. 3-11

C.G.S § 54-2a

Pr. Bk. Sec. 36-1, 36-2, 36-3

CFS #: 1700019568

STATE OF CONNECTICUT

SUPERIOR COURT

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New Canaan Police

Name (Last, First, Middle Initial)

Gluck, Bruce

Residence (Town) of accused

Middletown Springs

Court to be held at (Town)

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Affidavit - Continued

the drawer under the new system but never did under the old system. This was a confusing statement to us as zero cash was appearing on the new [redacted] system and also on her register. We showed [redacted] the till reports again to try and clarify what she was telling us earlier where she said she entered the money. Her earlier statements were not true (perhaps language barrier) based on how the [redacted] system works.

[redacted] asked if Wilson could do something in the computer to change it. We were told her that was not possible. She was assured her that she was not going to get into trouble (by speaking with the police) and again was asked if anyone ever asked her to not put money in the drawer. That [redacted] replied, "In the beginning we made a lot of mistakes so she (Wilson) told me to just put the money in the drawer (without entering it)". [redacted] said she loved her job and she doesn't want to lose it. She was asked if she ever heard rumors of someone stealing money. She said the girls would talk about it but never accused anyone.

36. That [redacted] continued that at the start of the day the cashiers are supposed to put in their name, their register and how much they started with in the drawer. She said each cashier is supposed to do the paper (deposit slip.) [redacted], as the head cashier was expected to get the girls to sign. She said the girls were reluctant to sign (because they knew something was wrong) so she went to Wilson and told her that the girls don't want to sign. [redacted] said she signed her paper (deposit slip) because she wanted to keep her job and she didn't want to be punished. [redacted] said that at one point Bruce Gluck spoke to her, Don't worry you're not doing anything wrong. At the end of the day they were also supposed to sign but they never knew how much they made because the drawer always went to Wilson to be counted. [redacted] said that she would sign the blank deposit slip but the other girls didn't want to sign. [redacted] said they were scared, they didn't want to lose their jobs. She said even though they were thinking something was wrong, nobody wanted to say anything. [redacted] said, "I didn't take any money." [redacted], with the help of her son, provided a written statement about what she experienced at the school.

37. That on March 19, 2018, Sgt. Casey met with [redacted]. She came in voluntarily for an interview and to give a statement in regards to this investigation. [redacted] has worked at the high school since 2006 and about in April 2017 she moved to Saxe middle school. In regards to the High School, [redacted] echoed other cashier statements by confirming that she did not have to count her draw in the morning, it was already set up for her. She said that she did not count the drawer at the end of the day either. She said that she noticed many times that the register would show a negative balance while closing out the drawer. She said it looked like she was making a mistake. Both Marie Wilson and Bruce Gluck told her not to worry about it.

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Date	APRIL 18 2019	Signed (Affiant) Sgt. M. So
Jurat	Subscribed and sworn before me on Date 4/18/19	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) [Signature]
Reviewed (Prosecutorial Official) [Signature]	Date: 4/18/19	Reviewed (Judge/Judge Trial Referee) [Signature] Date: 04/18/19

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New Canaan Police

Name (Last, First, Middle Initial) Gluck, Bruce	Residence (Town) of accused Middletown Springs	Court to be held at (Town) Stamford Superior	Geographical Area number S01S
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Affidavit - Continued

38. That she was asked if anyone ever told her not to enter the money in the register. She said, "not really, it was not Marie Wilson." [REDACTED] said she heard it from the other girls who were working there for a long time. She thought that was weird because she always worked in retail, even in her home country she knew what was happening wasn't right. [REDACTED] said that Marie Wilson did say something in the beginning when she started to work there. Wilson told her that she [REDACTED] didn't have to worry about how much money they make. Wilson told [REDACTED] not to worry because she would take care of that.

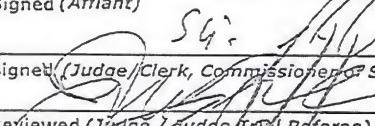
39. That [REDACTED] began trying to get the girls together to say something about how the money was handled. She said everybody was really scared. When she started doing this Wilson moved her to Saxe Middle school around April of 2017. [REDACTED] was surprised that the Board of Education didn't pick up on the loss of money sooner. She felt that the BOE should have picked up on how much food was being ordered and how much money was being taken in.

40. That when asked about Saxe Middle School [REDACTED] said the girls counted their own drawers. She thought this went back two years or so. Her statements were different than the statements from other employees. We weren't sure if there was a language barrier or if she was confused in some way as to the questions. [REDACTED] provided a written statement.

41. That on March 21, 2018 at approximately 1130 hours, I met with [REDACTED] and [REDACTED] for the purposes of clarifying some of [REDACTED] statements. [REDACTED] was sent to Saxe in April of 2017. According to [REDACTED] the [REDACTED] system was introduced in March of 2016 but the [REDACTED] portion wasn't fully implemented until March 2017. This would put [REDACTED] at Saxe while the [REDACTED] system and the [REDACTED] were in place. The other girls would have been counting their own drawers. [REDACTED] said that they began to do surprise audits at both schools and they would see discrepancies. When the [REDACTED] was instituted fully in March of 2017 they began seeing the rise in money at Saxe. [REDACTED] went on to say that prior to the [REDACTED] it looked as if [REDACTED] deposits were being put in but the others weren't.

42. That Sgt. Casey spoke with Bruce Gluck by telephone and we agreed to meet on March 20, 2018, at his residence. Gluck left a voicemail message on March 16, 2018, stating that he had to cancel the meeting due to medical testing and he would contact to reschedule. He never called back to set up a new meeting.

(This is page 10 of a 16 page Affidavit)

Date	APRIL 18, 2019	Signed (Affiant)	
Jurat	Subscribed and sworn before me on [REDACTED]	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	
Reviewed (Prosecutorial Official)	Date 4/18/19	Reviewed (Judge/Judge Trial Referee)	Date 04/18/19

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New Canaan Police

Name (Last, First, Middle Initial)

Gluck, Bruce

Residence (Town) of accused

Middletown Springs

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Affidavit - Continued

43. That on April 3, 2018, Marie Wilson came to Police Headquarters to return an iPad that belonged to New Canaan High School. Sgt. Casey and then myself, met with her. Wilson said that she found the iPad at her residence and didn't even realize that she still had it. She wanted to return it so she wouldn't be accused of stealing it. While speaking with Wilson in the lobby she seemed very upset. She stated that she can't sleep at night because she is so worried that police were going to knock on her door and arrest her. Wilson became even more upset. We sensed that she wanted to say something and asked if she wanted to sit down and talk. Wilson said she wasn't sure if she wanted to do that. We spoke for a bit longer and ultimately she decided to sit down and explain what really happened. During this second interview, Wilson understood that this interview was voluntary and she could leave at any time. Wilson said that she understood.

44. That Wilson said right away in the interview that she would put the money from the registers in her desk drawer. Sometimes it was counted and other times it was not. One day Bruce Gluck told her that he was going to need \$100.00 (one hundred dollars a day.) Wilson asked him why and he said it was for petty cash. Wilson was very upset while speaking with us. Wilson said up until the day he (Bruce Gluck) left he would take the \$100.00 a day. She said that if she didn't give it to him he would take it out of her desk drawer. Wilson said that sometimes Bruce Gluck would be sitting at her desk when she went to her office. I asked her how long this was going on for and she said it was going on since 2006. Wilson said that she never took any money. She would give [redacted] money to get supplies for them. Wilson said

[redacted] was frugal and would always get things cheaper than buying them at Staples. When it was noted that petty cash seemed to be used often Wilson said that if they had extra money. We asked her to explain that statement and she said that if the deposit was \$300 and they ended up with \$325.00 they wouldn't deposit the \$25.00 (twenty five dollars) and that money would be used for supplies. Wilson said that if the BOE had a function and they had to get a cake or if there was an event at the school they would use that money to buy those items. She said that Bruce Gluck would tell her to hang onto it but sometimes he would ask her for it. Gluck would tell her that he had to get something.

45. That Wilson said that she was pissed at him (Gluck) when he bought an expensive camera that he said he bought for the food service area but she never saw it again. Wilson said he had to have it repaired at one point and used the money from the school to fix the camera. (We had asked the BOE to provide the receipt for the camera but there were no receipts found).

46. That we explained to Wilson that when Bruce Gluck leaves the school the money does go up about

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Date	Signed (Affiant) <i>Sgt. P. Gluck Jr.</i>	
April 18, 2019		
Jurat	Subscribed and sworn before me on Date 4/18/19 Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>Sgt. P. Gluck Jr.</i>	
Reviewed by Prosecutorial Official <i>P. Gluck Jr.</i>	Date 4/18/19	Reviewed by Judge / Judge Trial Referee <i>J. S. P. Gluck Jr.</i>
	Date 04/18/19	

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Affidavit - Continued

\$100.00 a day. However the school is still short about \$200.00 a day and I asked Wilson to explain. She stated that maybe it was the school enrollment that was different. We told her there was no significant difference in enrollment that would cause such a fluctuation. Wilson said that as soon as Bruce Gluck left in January of 2016 she made sure the girls followed the ██████ protocols. That is when we begin to see the money go up. However the till reports still showed several registers that were taking in no cash after the ██████ was said to be instituted by Wilson. She could offer no explanation.

47. That Sgt. Casey and I continued to ask Wilson if she was taking any money above and beyond the money she admitted to giving to Bruce Gluck. Wilson was adamant that she was not taking any money. Wilson didn't want us to tell Bruce Gluck that she told us all this. She was afraid of Bruce Gluck. Wilson began to cry as we continued to question her. Wilson said that it was her fault and she should not have helped him. I asked why she felt she had to help (Gluck.) Wilson said that she didn't want to lose her job. We asked Wilson to provide a written statement. She asked us to write it for her because she couldn't see. Wilson dictated the statement to us and kept the audio recording going so her words were documented.

48. That on May 17, Wilson voluntarily came in again for a third interview. As before, she denied stealing money and only acknowledging that she did "steal" \$100 a day for Gluck. We asked again if she was giving Bruce Gluck more than \$100.00 a day. Wilson replied, "It was only a hundred, that I know of, I mean there were times that he was sitting in my office and I'm not saying not, and I did tell you that. I mean there were times where I thought I would have X amount of dollars in my drawer, because that's where I kept it. And you know, until the end of the day, and there were a lot of times I would say there is something not right. So then I stopped doing that, I started putting it in my um, file cabinet and I would lock it and that's it." Wilson said she couldn't guarantee how much he (Gluck) would take." Bruce was always in and out of her office and on her computer because he was her boss. He could have done anything he wanted to do. I asked Wilson if the \$100.00 was a steady amount or did it vary. Wilson replied, "No it was always a hundred, always, always five twenties, that was it." Wilson said Gluck would either take it from her desk or she would bring it to him in his office. Wilson told us that a couple of times she would purposely not give him the money to see what he would do and see if he would stop but he would go through her whole desk until he found it. Wilson said even if it was during exams, when they don't bring in much money, she would still have to give him the money. Wilson declined to take a polygraph.

49. That on August 11, 2018, Marie Wilson, was arrested for Larceny in the First Degree- Defrauding a

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Date	Signed (Affiant)		
April 18, 2019	Sgt. John - 50		
Jurat	Subscribed and sworn before me on Date 4/18/19 Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public)		
Reviewed @ (Prosecutorial Official) <i>M. M. Gluck</i>	Date 4/19/19	Reviewed (Judge / Judge Trial Referee) <i>J. S. P. J.</i>	Date 04/18/19

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Affidavit - Continued

Public Community in excess of \$2,000 for the New Canaan High School incident.

50. That on August 12, 2018, Wilson's sister, Joanne Pascarelli, in a parallel investigation that identified near identical circumstances occurring at her school- Saxe Middle School, was arrested for Larceny in the First Degree- Defrauding a Public Community in excess of \$2,000.

51. That during this investigation, former Food Services Director for the Town of New Canaan Board of Education, Bruce Gluck also became a prime suspect. On April 26, 2018, we attempted contact with Gluck to no avail. Messages were left on machine and with his wife.

52. That on April 27, 2018, at approximately 3:53 hours, we received an e-mail from attorney Ryan Henry of New Milford. Ryan subsequently referred us to Bruce Gluck's new Attorney, Gene Riccio, who was informed that in addition to the large theft of money Gluck was now suspected of, that the BOE had just filed another case (18-6205) with us involving the theft of an IPad, iPhone and building keys which they stated Bruce Gluck was in possession of. The immediate return of those items was requested.

53. That on May 10th Sgt. Casey spoke with Riccio and he stated that Bruce Gluck located the phone but he did not have the iPad or the keys. Riccio stated that Gluck turned over the iPad to Marie Wilson when he left the school. He told Riccio that is not correct because the iPad still "pings" to New Milford in the area of Mr. Gluck's residence. Riccio would speak to Bruce Gluck again in regards to the "pinging" iPad.

54. That on May 11th we received a call from Gene Riccio. He stated Gluck does have the iPad and the items will be returned immediately. On May 15th our department received a package from the law offices of Young & Riccio. In the package were the iPhone and iPad belonging to New Canaan High School. I checked the serial number on the iPad which is [REDACTED] which matches the iPad stolen from New Canaan High School.

55. That on May 16, 2018, Detective Patten tried to forensically analyze the Gluck's iPad using [REDACTED] software. The software showed negative results since the iPad was wiped and erased before it was returned to us.

56. That it is noted, that Bruce Gluck also retired- June 2017- near the same period of time that Pascarelli and Wilson left the school system and the cash dollar amounts began to increase substantially.

(This is page 13 of a 16 page Affidavit)

Date <i>April 18, 2019</i>	Signed (Affiant) <i>Sgt. [Signature]</i>
Jurat <i>Subscribed and sworn before me on [Date] 4/18/19</i>	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i>
Reviewed by (Prosecutorial Official) <i>[Signature]</i>	Date/ <i>4/18/19</i>
Reviewed by (Judge/Trial Referee) <i>[Signature]</i>	Date <i>4/18/19</i>

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Affidavit - Continued

57. That investigation into Bruce Gluck and his tenure began and his financial records were sent for analysis to Forensic Fraud Examiner [REDACTED] of the Rocky Hill Chief States Attorney's Office. The records were obtained by a valid Search and Seizure warrants signed by Stamford Superior Court Judges Comerford and White.

58. That Bruce Gluck was the Food Services Director for the Town of New Canaan- Board of Education from September 1, 1994 until June 30, 2017 and:

That the massive theft scheme occurring at New Canaan High School and Saxe Middle School was occurring directly during his supervisory authority and being committed by his immediate subordinates, who report directly to him. [REDACTED]

He was in charge of the management of monies taken in.

He was responsible for the money and its safekeeping

He was responsible for bank cash deposits and making sure they were occurring and in the correct amounts.

He was responsible for verifying cashier deposit slips.

He was responsible for verifying and maintaining documentation- records of which are now missing [REDACTED] records).

He was permanently located directly on scene at New Canaan High School and next to Wilson's office. He was not headquartered off the premises and cannot claim complete unawareness of what his Assistant Food Directors were doing.

59. That in addition to the theft of monies, allegations of food theft were also made but not pursued due to expiration of the Statute of Limitations. However, witness [REDACTED] now of [REDACTED] was once an employee of Waveny Care Center which is adjacent to New Canaan High School. She contacted

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Date	Signed (Affiant)		
April 18, 2019			
Jurat	Subscribed and sworn before me on Date	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public)	
Reviewed by Prosecutorial Official	Date: 4/18/19	Reviewed by Judge/Judge Trial Referee	Date: 04/18/19

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Affidavit - Continued

this department after learning of the arrests of Wilson and Pascarelli. stated that in the year 2000, Waveny Care Center was being remodeled and so they moved into and shared kitchen duties with the high school for approximately 5 months. described at one point inadvertently finding desk drawers filled with cash in one of the offices (Wilson's). The bills were loose and described it as if someone just dumped bags of money into the drawers. Another time . described an incident where Bruce Gluck backed his Volvo up to the loading dock and loaded it with cases of food from the school. said the vehicle was filled with food. believed that Gluck had a catering business on the side. was so concerned by what saw that . notified boss of the incident(s). It was decided to not say anything since they shared the kitchen with them (and wanted no trouble).

60. That Bruce Gluck did have a catering business during this time period- The Food Chain, INC. The business operated from June of 1997 to May of 2001. Another business operated by Gluck- Seasonal Cafes, INC. was dissolved on February 6, 2006.

61. That on April 10, 2019, I received a report form Forensic Examiner [REDACTED] in regards to the examination of Bruce Gluck's bank records. [REDACTED] detailed large numbers of cash deposits that were occurring since September of 2012 through March of 2017 (the parameters of the search warrant). The total amount of cash deposits totaled \$37,330.

62. That Bruce Gluck's Town of New Canaan paycheck was direct deposited and according to the Connecticut Secretary of State, neither he nor his wife has any corporate or business filings on record that generating any additional income during the theft time frame.

63. That from September 5, 2012, to December 31, 2013, Gluck's [REDACTED] was collecting unemployment. Her unemployment payment was also direct deposited.

64. That most of the Gluck cash deposits are occurring during the school year. There is a noticeable drop in cash deposits during the summer when school is not in session.

65. That due to the Statute of Limitations, as well as Gluck being out on [REDACTED] since January of 2017 through his retirement from the New Canaan Board of Education in June of 2017, \$24,645 of the \$37,330 is subject to charge. May 16, 2014, through December 14, 2016 is the date range that will be affected.

(This is page 15 of a 16 page Affidavit)

Date	APRIL 18, 2019	Signed (Affiant)	<i>St. J. Jr., A10</i>
Jurat	Subscribed and sworn before me on (Date) 4/18/19	Signed (Judge/Clerk, Commissioner of Superior Court, Notary Public) <i>[Signature]</i>	
Reviewed (Prosecutorial Officer)	Date 4/18/19	Reviewed (Judge/Judge Trial Referee)	Date 04/18/19

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Affidavit - Continued

66. That Bruce Gluck, through his attorney, declined to be interviewed by police in regards to the theft of money during his tenure as Food Services Director for the Town of New Canaan.

67. That the affiant, Sergeant Peter Condos, based upon his training and experience, believes that the facts and circumstances contained within this affidavit support that Bruce Gluck, date of birth: February 18, 1958, of 44 South St. Middletown Springs, Vermont, as Food Services Director for the Town of New Canaan, did knowingly steal, along with co-conspirator Marie Wilson, large amounts of cash that was taken in during the school lunch day during the school time period alleged, and did commit the crimes of Larceny in the First Degree (Defrauding Public Community, and Conspiracy to Commit Larceny in the First Degree (Defrauding Public Community), in violation of Connecticut General Statutes 53a-122 A(4) and 53a-48/53a-122 A(4) respectively, and Tampering with or Fabricating Physical Evidence for the wiping and erasing of the New Canaan High School computer, in violation of Connecticut General Statute 53a-155. That the affiant believes Probable Cause has been established and respectfully requests that an arrest warrant be issued.

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Date <i>APRIL 18, 2019</i>	Signed (Affiant) <i>SG: P. Condos 5/10</i>
Jurat <i>Subscribed and sworn before me on Date 4/18/19</i>	Signed (Judge/Clerk/Commissioner of Superior Court, Notary Public) <i>[Signature]</i>
Reviewed (Prosecutorial Official) <i>[Signature]</i>	Reviewed (Judge / Judge Trial Referee) <i>[Signature]</i>
	Date <i>04/18/19</i>